

EXHIBIT F

Exhibit 4

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102 to 105

<p style="text-align: right;">Page 102</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Got you.</p> <p>3 Q. And do you see five names here, Ben</p> <p>4 Wilson, Evren Ery -- I can't say his last name --</p> <p>5 Eryurek, Jonathan Nelson, Nicholas Harteau, and</p> <p>6 Paul Strong? Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Were those all in OCTO?</p> <p>9 MR. GAGE: Objection. At what point</p> <p>10 in time are you talking about?</p> <p>11 MS. GREENE: This is as of November</p> <p>12 20th, 2017.</p> <p>13 A. So I know Ben Wilson was; I am</p> <p>14 familiar with him. The other names look somewhat</p> <p>15 familiar so I -- I would, yes, they were probably</p> <p>16 in OCTO.</p> <p>17 Q. Other than these individuals at</p> <p>18 Level 9, were there other technical solutions</p> <p>19 consultants at Level 9 within Cloud not listed</p> <p>20 here?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. I wouldn't be able to definitively</p> <p>23 say without looking at the document myself.</p> <p>24 Q. If you go down to Page 7, beginning</p> <p>25 with Line 284, do you know whether any of those</p>	<p style="text-align: right;">Page 104</p> <p>1 - KEVIN LUCAS -</p> <p>2 time.</p> <p>3 MR. GAGE: Right, but I don't know</p> <p>4 that the witness knows that so that's the</p> <p>5 basis of my objection is you're not be</p> <p>6 specific about when you're asking him.</p> <p>7 Q. 2017, 2018, and 2019, were there</p> <p>8 technical solutions consultants in Google Cloud</p> <p>9 outside of OCTO?</p> <p>10 A. Technical solu -- any level on the</p> <p>11 job family, yes.</p> <p>12 Q. Level 8 or 9.</p> <p>13 A. I can't confirm Level 8 or 9 outside</p> <p>14 of OCTO without doing some research, because that</p> <p>15 job family is used in other parts of Cloud.</p> <p>16 So in our go-to-market organization,</p> <p>17 that is the job family that is used for customer</p> <p>18 solutions engineer for which I think, I'm</p> <p>19 almost positive, at that point in time there</p> <p>20 were -- there was at least one director. Whether</p> <p>21 it's Level 8 or 9, I'm not sure.</p> <p>22 Q. So with respect to clust -- customer</p> <p>23 solutions engineer, is it your testimony that they</p> <p>24 also used the technical solutions consultant</p> <p>25 ladder?</p>
<p style="text-align: right;">Page 103</p> <p>1 - KEVIN LUCAS -</p> <p>2 principal technical solutions consultants at Level</p> <p>3 8 are outside of OCTO?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I would have to look up each</p> <p>6 individual one. A couple of names sound familiar,</p> <p>7 but I would have to look it all up.</p> <p>8 Q. Have you seen this list before?</p> <p>9 A. No.</p> <p>10 Q. And so if I were to tell you that at</p> <p>11 any point over -- you know, this is different</p> <p>12 snapshots for three different years. If that each</p> <p>13 of those snapshots it showed only technical</p> <p>14 solutions consultants within OCTO, is it your</p> <p>15 testimony that there were technical solutions</p> <p>16 consultants at Levels 8 and 9 within Google Cloud</p> <p>17 outside of OCTO?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Again I --</p> <p>20 MR. GAGE: Are you talking about a</p> <p>21 specific point in time, are you talking about</p> <p>22 today?</p> <p>23 MS. GREENE: The years that these</p> <p>24 documents reflect. These documents are again</p> <p>25 snapshots from three different periods of</p>	<p style="text-align: right;">Page 105</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Yes, that is my understanding and I</p> <p>3 think they still do.</p> <p>4 Q. And that's an Eng role?</p> <p>5 A. No, it is not.</p> <p>6 Q. Are there other roles that use the</p> <p>7 technical solutions consultant ladder?</p> <p>8 A. I am not aware of other roles within</p> <p>9 Cloud, other than the ones that I've mentioned,</p> <p>10 that use the TSC job family. There are several</p> <p>11 roles outside of Cloud that use that family.</p> <p>12 Q. Focusing on director level</p> <p>13 roles --</p> <p>14 A. Okay.</p> <p>15 Q. -- what are the substantive</p> <p>16 differences between a director in a technical</p> <p>17 solutions consultant role and a product management</p> <p>18 role?</p> <p>19 A. Oh, they're -- they're rather</p> <p>20 different roles.</p> <p>21 A product manager -- a product</p> <p>22 management director is defining the strategy of</p> <p>23 the product in the multi-tier road map and</p> <p>24 partnering with engineering to actually build</p> <p>25 according to that road map and deliver that</p>

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122 to 125

<p style="text-align: right;">Page 122</p> <p>1 - KEVIN LUCAS -</p> <p>2 specific number, but I would say it's very, very</p> <p>3 few.</p> <p>4 Typically once you move -- or at</p> <p>5 Level 8 and above. The vast majority of</p> <p>6 people in those roles are people managers unless</p> <p>7 your role is maybe a bit nuanced or specialized or</p> <p>8 divergent in -- in some way. So, for example,</p> <p>9 I've worked with director-level chief of staff who</p> <p>10 was an individual contributor.</p> <p>11 Q. And what significance does being an</p> <p>12 individual contributor versus being a person</p> <p>13 manager have for an individual; how is that -- how</p> <p>14 is that designation used in the decision-making</p> <p>15 process at Google?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. Can I ask you to clarify what</p> <p>18 decision-making process?</p> <p>19 Q. I'm trying to understand everything</p> <p>20 that may be implicated by someone having the</p> <p>21 designation of individual contributor versus</p> <p>22 manager.</p> <p>23 A. Oh, okay.</p> <p>24 MR. GAGE: Objection.</p> <p>25 Go ahead.</p>	<p style="text-align: right;">Page 124</p> <p>1 - KEVIN LUCAS -</p> <p>2 managers people management training from</p> <p>3 which I'm not sure if people place much</p> <p>4 significance on that aspect of it. Yeah, I -- I</p> <p>5 don't see that it's -- there's a lot of</p> <p>6 significance in it.</p> <p>7 Q. With respect to the distinguished</p> <p>8 technical solutions consultant role --</p> <p>9 A. Okay.</p> <p>10 Q. -- are you aware of a minimum number</p> <p>11 of years of experience needed for that role?</p> <p>12 A. I -- I would have to consult the</p> <p>13 guidelines. I would speculate that you said it</p> <p>14 distinguishes L 8, if I remember correctly. I</p> <p>15 would speculate it's probably somewhere between</p> <p>16 upper teens, maybe twenty.</p> <p>17 Q. What about with respect to the L 9</p> <p>18 role?</p> <p>19 A. I would say -- and a qualifier to</p> <p>20 that is relevant years of experience. For the</p> <p>21 L 9, I would probably say just kind of a handful</p> <p>22 more than -- than whatever that memo is.</p> <p>23 Q. Do you know this to be the case or is</p> <p>24 this your assumption based on what you know about</p> <p>25 Google generally?</p>
<p style="text-align: right;">Page 123</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Apologies, I'm trying to think</p> <p>3 through like the -- the fundamental differences</p> <p>4 there.</p> <p>5 I'm saying it's not diff -- IC versus</p> <p>6 people manager isn't necessarily an -- an</p> <p>7 individual decision; it's a structural decision or</p> <p>8 a functional decision, right. So it's -- I think</p> <p>9 we could be hard-pressed to find a Level 8</p> <p>10 director saying I want to be an individual</p> <p>11 contributor and that making sense enough to</p> <p>12 actually doing that.</p> <p>13 That said, there are the nuances that</p> <p>14 I mentioned before like a chief of staff or highly</p> <p>15 specialized or nuance role whatever it may be. I</p> <p>16 would say what significance it has, I can't say</p> <p>17 too much because when I think about it from a</p> <p>18 performance or promotion perspective you're still</p> <p>19 evaluated on the expectations of your -- your role</p> <p>20 and ladder regardless of people manager versus</p> <p>21 ICs.</p> <p>22 I'm not aware of any compensation</p> <p>23 differences between people manager versus ICs.</p> <p>24 It's -- it's -- there's a slight difference in</p> <p>25 terms of training, whereby we offer people</p>	<p style="text-align: right;">Page 125</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Well, it's --</p> <p>3 MR. GAGE: Objection.</p> <p>4 Go ahead.</p> <p>5 A. Without -- without looking -- I said</p> <p>6 it is speculative without looking at the -- the</p> <p>7 specific leveling guidelines; but in observation</p> <p>8 of directors we have brought into the</p> <p>9 organization, that's what leads me to that number.</p> <p>10 Q. When we looked at the leveling</p> <p>11 guidelines earlier we didn't see a minimum number</p> <p>12 of years, correct?</p> <p>13 MR. GAGE: Objection.</p> <p>14 You can look back at the document if</p> <p>15 you'd like, but -- do you know which document</p> <p>16 that was that you're referring to, Cara?</p> <p>17 MS. GREENE: Yeah, give me one</p> <p>18 moment.</p> <p>19 THE WITNESS: I think it was 10 --</p> <p>20 no.</p> <p>21 Q. Did you find it for the technical</p> <p>22 solutions consultant?</p> <p>23 A. I haven't yet. I'm clicking through</p> <p>24 each tab.</p> <p>25 Q. All right, I've got it. Give me one</p>

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<p style="text-align: right;">Page 126</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 moment.</p> <p>2</p> <p>3 A. I think I -- no, that wasn't the one.</p> <p>4 Q. Try Tab 26.</p> <p>5 MR. GAGE: And is that the document</p> <p>6 you were referring to in your question?</p> <p>7 MS. GREENE: It was.</p> <p>8 A. You're correct, and it is not</p> <p>9 mentioned in this document; but this document is</p> <p>10 behavioral descriptors across levels, so similar</p> <p>11 to the SWE ladder whereby we articulate</p> <p>12 complexity, scope, things like that across level.</p> <p>13 Q. Are you aware of any other document</p> <p>14 that includes leveling guidelines for technical</p> <p>15 solutions consultant?</p> <p>16 A. Not specific to technical solutions</p> <p>17 consultant. I'm trying to find the --</p> <p>18 Q. Are you aware of anything that</p> <p>19 outlines any sort of years requirement with</p> <p>20 respecting -- with respect to the leveling of</p> <p>21 technical solutions consultant?</p> <p>22 A. Nothing unique to TSCs. I apologize,</p> <p>23 that's why I'm looking a little confused, because</p> <p>24 I can't remember seeing anything that is job</p> <p>25 family-specific leveling guidelines.</p>	<p style="text-align: right;">Page 128</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 right now.</p> <p>2</p> <p>3 THE WITNESS: Is that -- is that a</p> <p>4 good break for you?</p> <p>5 MS. GREENE: Sure.</p> <p>6 THE WITNESS: Does that work?</p> <p>7 MS. GREENE: Uh-huh.</p> <p>8 THE VIDEOGRAPHER: Okay. We're going</p> <p>9 off the record, the time is 3:54 New York</p> <p>10 time.</p> <p>11 (Whereupon, there was a brief recess</p> <p>12 in the proceedings.)</p> <p>13 THE VIDEOGRAPHER: The time is 4:02</p> <p>14 p.m. New York time, we're back on the record.</p> <p>15 Q. Okay. I want you to take a look at</p> <p>16 what's been marked as Exhibit 11. This is the</p> <p>17 spreadsheet and so you may by going to the</p> <p>18 upper -- there might be a Box in the upper</p> <p>19 right-hand corner that allows you to choose what</p> <p>20 format you open up in.</p> <p>21 A. Okay. Unfortunately it says "Box for</p> <p>22 office online has locked," so I can only look at</p> <p>23 it in basically a PDF view. Let me actually go</p> <p>24 back and try to right click and open differently.</p> <p>25 It does not allow me to open it</p>
<p style="text-align: right;">Page 127</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1</p> <p>2 Q. With respect to years of experience,</p> <p>3 are you aware of anything generally that sets</p> <p>4 forth level for -- years of experience with</p> <p>5 respect to leveling for people at the L 8 or L 9</p> <p>6 levels?</p> <p>7 A. That's -- that's what I was just</p> <p>8 trying to think through and -- let me think a</p> <p>9 little more.</p> <p>10 I can't remember anything. It's so</p> <p>11 frustrating.</p> <p>12 Q. It's okay. If you don't remember or</p> <p>13 you don't know, that's a fine answer as well. Is</p> <p>14 your answer you don't remember sitting here right</p> <p>15 now?</p> <p>16 A. I don't remember.</p> <p>17 Q. Okay. With respect --</p> <p>18 MR. GAGE: Can we take break at some</p> <p>19 point, convenient break?</p> <p>20 THE WITNESS: Thank you. Forgive me,</p> <p>21 sorry, I can't really follow.</p> <p>22 MS. GREENE: Sure, I see you drinking</p> <p>23 the Coke there. It's fine.</p> <p>24 THE WITNESS: I know.</p> <p>25 MS. GREENE: We can go off the record</p>	<p style="text-align: right;">Page 129</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 differently. It's -- there's a -- when I right</p> <p>2 click, it says I can request unlock.</p> <p>3</p> <p>4 Q. Yeah. We had requested unlock for</p> <p>5 you to be open it in Excel.</p> <p>6 A. I can try here and see if I can.</p> <p>7 Q. I'm not going to ask you anything too</p> <p>8 detailed about this.</p> <p>9 A. Okay.</p> <p>10 Q. The first question, if you're able to</p> <p>11 zoom in at all, is whether you even recognize what</p> <p>12 this document is?</p> <p>13 A. I don't recognize this document,</p> <p>14 but it appears as though the content is the</p> <p>15 descriptors of how we would assess a candidate</p> <p>16 across four different attributes.</p> <p>17 MR. GAGE: And I just -- can I just</p> <p>18 note, I have a icon that says "The file is</p> <p>19 being edited with Box for office online."</p> <p>20 What does that mean?</p> <p>21 MS. GREENE: It may mean that because</p> <p>22 you opened it and we gave access --</p> <p>23 MR. GAGE: Okay.</p> <p>24 MS. GREENE: -- you -- you're able to</p> <p>25 edit it, but --</p>

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<p style="text-align: right;">Page 138</p> <p>1 - KEVIN LUCAS -</p> <p>2 Q. So level is one thing that's</p> <p>3 considered in setting someone's salary?</p> <p>4 A. Yes.</p> <p>5 Q. Are there salary guidelines that</p> <p>6 apply with respect to level?</p> <p>7 A. Yes, with respect to each of those</p> <p>8 three things mentioned, role, level, and location.</p> <p>9 So the -- Google is a little bit different in that</p> <p>10 we don't have salary ranges for specific role,</p> <p>11 level, and locations.</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 Q. So if you knew someone's role, level,</p> <p>19 and location, how would you go about figuring out</p> <p>20 what their salary should be?</p> <p>21 A. Meaning myself or if I was just an</p> <p>22 Googler?</p> <p>23 Q. How does Google go about determining</p> <p>24 what someone's salary should be once someone's</p> <p>25 role, level, and location is known?</p>	<p style="text-align: right;">Page 140</p> <p>1 - KEVIN LUCAS -</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED] So you can only access it</p> <p>15 for the short period of time by short-planning</p> <p>16 compensation.</p> <p>17 Q. So individuals who are coming in into</p> <p>18 the same role in the same level in the same</p> <p>19 market, would they be paid the same salary?</p> <p>20 A. It is possible, but in any sort of</p> <p>21 external offer, right, you can negotiate your</p> <p>22 salary.</p> <p>23 And I think in practice we try not to</p> <p>24 negotiate salary that much because you can</p> <p>25 imagine if you start negotiating salary, and in</p>
<p style="text-align: right;">Page 139</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 Q. No, please finish.</p> <p>14 A. [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 141</p> <p>1 - KEVIN LUCAS -</p> <p>2 pretty meaningful ways, you -- [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 Q. So what are the factors that are</p> <p>18 entered into, what are the data points that are</p> <p>19 entered in to calculate what the starting point</p> <p>20 for the compensation discussion should be?</p> <p>21 And I'm specifically looking at</p> <p>22 hiring right now.</p> <p>23 A. Sure.</p> <p>24 Q. We'll come back to comp discussions</p> <p>25 in the course of the, you know, performance</p>

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[illegible]

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[illegible]

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174 to 177

<p style="text-align: right;">Page 174</p> <p>1 - KEVIN LUCAS -</p> <p>2 look different?</p> <p>3 A. Day-to-day responsibilities for</p> <p>4 software engineering don't change a whole lot from</p> <p>5 Level 8s to 9. It is similar to our conversation</p> <p>6 we previously had, whereby either the scope and</p> <p>7 visibility and impact of their role shifts in some</p> <p>8 ways.</p> <p>9 So they are probably more aligned to</p> <p>10 a higher priority product, perhaps a more kind of</p> <p>11 innovative product if you will. They may start</p> <p>12 leading a larger organization whereby more,</p> <p>13 quote/unquote, products roll up to them.</p> <p>14 So it's more about kind of scope and</p> <p>15 product prior -- priority than shifting day-to-day</p> <p>16 responsibilities from an L 8 to L 9 software</p> <p>17 engineer.</p> <p>18 Q. What are the skills necessary for an</p> <p>19 L 8 software engineer?</p> <p>20 A. Coding ability is probably the -- the</p> <p>21 fore -- the forerunner there for which they still</p> <p>22 have to go through coding interviews when code is</p> <p>23 submitted in their interview packets, et cetera,</p> <p>24 so that is probably the largest one.</p> <p>25 There's going to be elements,</p>	<p style="text-align: right;">Page 176</p> <p>1 - KEVIN LUCAS -</p> <p>2 that makes sense.</p> <p>3 Q. And with respect to the director of</p> <p>4 product management, what are the day-to-day</p> <p>5 responsibilities for a director of product</p> <p>6 management Level 8 look like?</p> <p>7 A. Level 8, yeah. There are going to be</p> <p>8 probably a few different elements there.</p> <p>9 There's going to be part of their</p> <p>10 time that's spent on strategic direction of the</p> <p>11 product and the ability defining where we want to</p> <p>12 take this product on a multi-year road map and</p> <p>13 starting to form a point of view on how we deliver</p> <p>14 that -- that road map over the next, let's say,</p> <p>15 six months to a few years.</p> <p>16 There's an element around kind of</p> <p>17 data analysis and customer feedback, so adjusting</p> <p>18 how customers are using the product or service</p> <p>19 and -- and responding to that feedback in either</p> <p>20 reactive ways to support the need we didn't meet</p> <p>21 or perhaps proactively thinking about features</p> <p>22 that we can build into the product or service that</p> <p>23 may unlock value to their business that they may</p> <p>24 not necessarily see.</p> <p>25 L 8 product managers are -- are</p>
<p style="text-align: right;">Page 175</p> <p>1 - KEVIN LUCAS -</p> <p>2 depending on which track you're on, of leading a</p> <p>3 team or organization. You're probably gonna to</p> <p>4 see elements of strategic thinking to execution</p> <p>5 because you have to be able to work with product</p> <p>6 managers on -- on kind of building up that product</p> <p>7 road map, but you also have to -- with production</p> <p>8 managers on building the product road map and then</p> <p>9 working with frontline engineers to actually code</p> <p>10 the products themselves.</p> <p>11 So it's a pretty interesting blend of</p> <p>12 technical depth and kind of product leadership.</p> <p>13 Q. And --</p> <p>14 MS. GREENE: Hope, can you read back</p> <p>15 the last question. Just the question, not</p> <p>16 the answer.</p> <p>17 (The question requested was read back</p> <p>18 by the reporter.)</p> <p>19 Q. And what different skills are is</p> <p>20 required of a Level 9 --</p> <p>21 MR. GAGE: Objection.</p> <p>22 Q. -- a Level 9 software engineer?</p> <p>23 A. If I -- I would probably say it's</p> <p>24 just greater depth or ability of what I just</p> <p>25 mentioned. So similar buckets, just more of if</p>	<p style="text-align: right;">Page 177</p> <p>1 - KEVIN LUCAS -</p> <p>2 people leaders, so there's not a kind of</p> <p>3 individual or technical track in the manager</p> <p>4 track; it's all one. So they're likely lead a --</p> <p>5 probably a small to medium-sized team of product</p> <p>6 managers on respective product or groups of</p> <p>7 related products.</p> <p>8 And then similar to software</p> <p>9 engineering, there's a portion of their time</p> <p>10 that's spent in kind of meeting, corroborating</p> <p>11 with Eng, talking about feasibility and product</p> <p>12 road maps, and how we actually think about</p> <p>13 building these -- these over time.</p> <p>14 Similar to software engineering, the</p> <p>15 difference between L 9 -- L 8 and L 9 is largely</p> <p>16 scope, scope -- scope, product complexity, or</p> <p>17 product portfolios that we will likely grow them</p> <p>18 into additional prod -- roles that have</p> <p>19 responsibility for additional products and/or ask</p> <p>20 them to build out more nascent products. So it's</p> <p>21 going to be the innovation side of it.</p> <p>22 Q. And I apologize if you already</p> <p>23 answered this: Is -- product management, is that</p> <p>24 considered an Eng role as you consider it?</p> <p>25 A. So Eng is most often referred to as</p>